

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA

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UNITED STATES OF AMERICA,

Case No. 22-CR-222 (NEB/TNL)

Plaintiff,

v.

**MOTION TO MODIFY  
CONDITIONS OF RELEASE**

KHADAR JIGRE ADAN,

Defendant.

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Khadar Jigre Adan, by and through his undersigned attorneys, respectfully moves the Court for an order modifying his terms of release to allow him to temporarily leave the State of Minnesota and the United States on July 17, 2023 to travel to Turkey, Kenya, and Ethiopia for business purposes. He will return no later than August 11, 2023.

Mr. Adan owns three properties in Turkey, Kenya, and Ethiopia. The properties are potentially income-producing if he is able to take title to these properties. The properties are an individual apartment unit in Ankara, Turkey; an individual apartment unit in Mombasa, Kenya; and land in Jijiga, Ethiopia. This travel is necessary because Mr. Adan must be physically present to complete the necessary title transfer documentation for these properties. Mr. Adan has tried without success to complete the arcane title requirements by using mail and proxies. Unfortunately, it is necessary for him to appear in person to complete the title process. The defendant acquired these properties prior to any involvement in the transactions alleged in the indictment. All three properties

were disclosed to pretrial services in his Declaration of Defendant or Offender Net Worth and Cash Flow Statements.

Pretrial services assigned Mr. Adan as a category 1 for pretrial risk assessment, the category least likely to fail to appear. Mr. Adan's risk of flight is negligible. His family, his fully-paid-for home, and his businesses are all located in Minnesota. Unlike many of the defendants in the Feeding our Future cases, Khadar Adan is not accused of a large-scale fraud. Mr. Adan's profits as alleged in the indictment came to approximately \$60,000. Although this is not an insufficient amount, it is modest in comparison to almost all other defendants. Consequently, he is a minimal flight risk and will return to the United States for his next scheduled court appearance and will be present for his jury trial. My office has worked closely with Mr. Adan to compile documents and prepare an itinerary, all of which have been provided to U.S. Probation and the U.S. Attorney's Office.

We also respectfully request that the Judge order U.S. Probation to return Mr. Adan's passport to him for purposes of this trip and also order that upon his return to Minnesota he will again provide the passport to U.S. Probation.

The defense has spoken with Assistant United States Attorney Harry Jacobs, who does not oppose this Motion for Modification.

Dated: July 10, 2023

Respectfully submitted,

/s/ William J. Mauzy

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